

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. and TAKE-TWO  
INTERACTIVE SOFTWARE, INC.,

Defendants.

CASE NO. 1:17-cv-02635-CAB

**UNOPPOSED MOTION TO SEAL DEFENDANTS'  
MEMORANDUM OF LAW IN SUPPORT OF THEIR MOTION FOR  
PARTIAL SUMMARY JUDGMENT AND EXHIBITS THERETO**

In accordance with Local Rule 5.2 and the Court's Protective Order (Dkt. 32), Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc. (collectively, "Take-Two") hereby move for leave to file under seal: (1) an unredacted version of their forthcoming memorandum of law in support of their motion for partial summary judgment, and (2) accompanying exhibits to an attorney declaration. Specifically, Take-Two moves for leave to file under seal portions of its memorandum and accompanying exhibits containing confidential information, including sensitive testimony by third parties, designated confidential or highly confidential pursuant to the Protective Order entered in this case. Dkt. 32. To maintain the confidentiality of that information, therefore, Take-Two will file public, redacted versions of its memorandum and exhibits, and seeks leave by this motion to file the unredacted versions under seal. Take-Two will serve Plaintiff with the unredacted versions of all filings including the memorandum and exhibits, and will file under seal the unredacted versions when the Court grants this motion or as otherwise directed by the Court.

Take-Two explained the basis for this motion to Plaintiff, and he does not oppose it.

Dated: October 27, 2023

*/s/ Dale M. Cendali*

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Dale M. Cendali (*pro hac vice*)  
Joshua L. Simmons (*pro hac vice*)  
Chris Ilardi (*pro hac vice*)  
KIRKLAND & ELLIS LLP  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
dale.cendali@kirkland.com  
joshua.simmons@kirkland.com  
chris.ilardi@kirkland.com

Miranda D. Means (*pro hac vice*)  
KIRKLAND & ELLIS LLP  
200 Clarendon Street  
Boston, Massachusetts 02116  
Telephone: (617) 385-7500  
miranda.means@kirkland.com

Matthew J. Cavanagh (0079522)  
MCDONALD HOPKINS LLC  
600 Superior Avenue, East, Ste. 2100  
Cleveland, Ohio 44114  
Telephone: 216.348.5400  
Fax: 216.348.5474  
mcavanagh@mcdonaldhopkins.com

*Attorneys for Take-Two 2K Games, Inc. and  
Take-Two Interactive Software, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 27, 2023, a copy of the foregoing was filed electronically. Notice of this filing was sent by operation of the Court's Electronic Filing System to all parties indicated on the electronic filing receipt, and parties may access this filing through the Court's System.

/s/ Dale M. Cendali  
Dale M. Cendali